

REMARKS

This response is to the Non-Final Office Action dated May 6, 2003. Claims 6, 7 and 11 to 13 were pending previously in this application. Claims 6 and 11 are being amended herein. Claim 13 has been canceled without prejudice or disclaimer. Claims 14 to 27 have been added. No new matter has been introduced by those amendments or additions.

In the Office Action, claims 6, 7, 11 and 12 were rejected under 35 U.S.C. Section 102(b) as being anticipated by U.S. Patent No. 4,484,6082 to Ferdinand et al. ("*Ferdinand*"). Claim 13 was rejected under 35 U.S.C. Section 103(a) as being obvious in view of *Ferdinand* and U.S. Patent No. 6,360,798 to Apolinski ("*Apolinski*").

Independent claims 6 and 11 have been clarified in this Response to recite that the table top itself defines the plurality of hole patterns having different hole center distances for mounting routers with different mounting footprints. The Office Action admits that *Ferdinand* does not disclose the router holes being defined by the table top. Applicants therefore respectfully submit that the amendment overcomes the anticipation rejection.

The Office Action then sets forth two arguments in support of its finding that a router table itself defining different mounting holes is obvious. First, the Office Action asserts that the distinction of the claims over *Ferdinand* is a mere rearrangement of parts. Applicants respectfully assert that the invention of claims 6 and 11 is not a mere rearrangement of parts with respect to *Ferdinand*. Indeed, the present invention eliminates one of the parts of *Ferdinand*, namely, the separate mounting plate 94. The *Ferdinand* table requires a separate piece that defines router holes. The table of the present invention, on the other hand, provides the holes directly in the table top, reducing cost and complexity.

The difference is not a mere rearrangement of parts but instead is a different structural configuration, yielding advantages to the Applicants, the essence of mechanical claim patentability. Applicants' invention provides advantages over the art of record, namely, ease of operation, cost and simplicity. Applicants' table still functions as a support apparatus and work station despite the holes made therein. Applicants however have made use of the fact that the table top provides ample space on which to provide at least many of the different mounting footprints of today's commercially available routers. Applicants' table top eliminates the possibility of losing or misplacing an insert, such as insert 94, defining the router holes as is possible with the table of *Ferdinand*. Moreover, the holes of Applicants' table are available for

use without having to remove another insert and to mount the router hole insert in place. Moreover, making holes in Applicants' table is less costly than providing a table top with: (1) means for securing a separate insert and (2) the separate insert with holes defined therein. Applicants therefore respectfully submit that the structural differences between the table top of claims 6 and 11 and *Ferdinand* are not obvious.

The Office Action also combines *Apolinski* with *Ferdinand* to render the claimed distinctions obvious. Applicants respectfully remind the Patent Office that *Apolinski* is the priority document for the present application, namely, the present application is a continuation-in-part of *Apolinski* (S/N 09/636,702). Applicants refer the Patent Office to the Patent Application Transmittal filed originally with the application, which shows the continuation-in-part box marked and the priority document S/N 09/636,702 clearly presented. Accordingly, *Apolinski* is not prior art to the present invention.

Applicants respectfully submit that the claims as currently clarified are structurally different and patentable in view of *Ferdinand*. Accordingly, claims 6 and 11 and 7, 14 to 20 and 21 to 27 that depend respectively therefrom are each currently patentable and in condition for allowance.

For the foregoing reasons, Applicants respectfully submit that the above identified patent application is now in a condition for allowance and earnestly solicit reconsideration of same.

Respectfully submitted,
BELL, BOYD & LLOYD LLC

BY 

Robert W. Connors
Reg. No. 46,639
P.O. Box 1135
Chicago, Illinois 60690-1135
Phone: (312) 807-4214